

## DISCOVERY PLAN WORKSHEET

### Phase I (Pre-Settlement Discovery)

<b>Deadline for completion of Rule 26(a) initial disclosures and HIPAA-compliant records authorizations:</b> <i>(Reciprocal and agreed upon document production and other discovery necessary for a reasoned consideration of settlement. Presumptively 60 days after Initial Conference.)</i>	1/21/2020
<b>Completion date for Phase I Discovery as agreed upon by the parties:</b> <i>(Reciprocal and agreed upon document production and other discovery necessary for a reasoned consideration of settlement. Presumptively 60 days after Initial Conference.)</i>	3/6/2020
<b>Date for initial settlement conference:</b> <i>(Parties should propose a date approximately 10-15 days after the completion of Phase I Discovery, subject to the Court's availability)</i>	3/17/2020

### Phase II (Discovery and Motion Practice)

<b>Motion to join new parties or amend the pleadings:</b> <i>(Presumptively 15 days post initial settlement conference)</i>	4/1/2020
<b>First requests for production of documents and for interrogatories due by:</b> <i>(Presumptively 15 days post joining/amending)</i>	4/16/2020
<b>All fact discovery completed by:</b> <i>(Presumptively 3.5 months post first requests for documents/interrogatories)</i>	8/3/2020
<b>Exchange of expert reports completed by:</b> <i>(Presumptively 30 days post fact discovery)</i>	9/2/2020
<b>Expert depositions completed by:</b> <i>(Presumptively 30 days post expert reports)</i>	10/2/2020
<b>COMPLETION OF ALL DISCOVERY BY:</b> <i>(Presumptively 9 months after Initial Conference)</i>	<b>SEPTEMBER 19, 2020</b> 10/9/2020
<b>Final date to take first step in dispositive motion practice:</b> <i>(Parties are directed to consult the District Judge's Individual Rules regarding such motion practice. Presumptively 30 days post completion of all discovery)</i>	11/9/2020
<b>Do the parties wish to be referred to the EDNY's mediation program pursuant to Local Rule 83.8?</b>	Yes